

# STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION  
AND PUBLIC FACILITIES  
DIVISION OF STATEWIDE PLANNING

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COPY

Mr. Terry Hoefflerle  
Chief Operating Officer  
Bristol Bay Native Association  
P.O. Box 310  
Dillingham, AK 99576

Re: SW Transportation Plan Airport Improvement Analysis

Dear Mr. Hoefflerle:

Thank you for your letter of April 18 in which you cited several shortcomings noted in the Draft *Airport Improvement Analysis Technical Memorandum*, as well as offering additional input. I will try to address your comments here.

First, we acknowledge the inadequacy of the analysis. Our own comments to the consultant were seven pages in length. Incomplete data was compounded by errors. We are in the process of revising the analysis in its entirety. We wanted to get the draft out the door in time for comments at the April 7 SWAMC meeting. In retrospect, we should have given it a more stringent internal review. Concerning your specific points:

•YK Aviation model inappropriate - We agree there are several difficulties with applying the model as developed for the YK region. However, we believe the basic approach and objectives are valid. Our hope is to develop a methodology for determining when and where the airport master planning process should be applied, and to have an idea of what improvements are most critical to the region as a whole. We also feel that identifying and examining likely "fleet replacement" aircraft appropriate to regional air carrier operations is valuable both for us in anticipating facility needs and for the air carriers. YK aviation model developer Dr. Bob Whitford met with the consultant in mid-May and discussed the model and utility of its results. Differences between the regions in commercial activity, particularly fishing and tourism, have indeed been accounted for in the model developed by the consultant - only the data was in error. We believe the additional technical work performed to improve the data quality and better develop the results will prove extremely valuable to the region in the long run, and it will answer most of your concerns.

●Plan holding region “hostage” - What I hear from Southwest residents tells me that they are almost universally disappointed with the State’s level of major transportation investment in Southwest Alaska over the past 25 years - without a regional transportation plan. While we are very optimistic this plan will have a positive impact on the region as a whole, we admit that not all communities will benefit immediately. The plan’s focus is on identifying and prioritizing improvements *significant to the region’s long term benefit*. One thing to keep in mind is that the plan is still just that - a plan. It will provide a framework for positive action - not an excuse for holding you back. If circumstances develop that deviate significantly from what was planned for, the plan can (and should) be updated. We do not expect even a “perfect” 20-year plan to make it through the first ten years of its life before needing an update. The planning process - where key data is identified, people are involved, opinions shared, goals and objectives established, dreams formulated, and a mutual course decided upon - is the real value of the plan. That basis of mutual understanding will remain with the region and give life to the plan’s implementation, as well as clue you as to when its time for an update.

●Freight statistics low - Thank you for this information. We have retrieved USPS bypass mail data to include in the analysis, which we believe will fill in the gaps in our freight numbers. We also discovered a number of data entry errors, and have corrected them.

●Village infrastructure - Thank you for the information concerning elderly nutrition programs, head start and food bank. We are assuming any aviation movements from these programs would be accounted for in the USPS and FAA data. If you think these may fall outside the system, we request you provide us points of contact we could follow up with.

-Runway length - Thank you for this information. As stated earlier, we are revising the analysis based on reported USPS data and corrected FAA data. We have heard and understand the concerns shared by several communities concerning runway length - for the State it is a question of universal minimum standard vs. selected improvement based upon greatest need. The former is more appropriately dealt with in the Statewide Aviation System Plan. The latter we can address in the regional plan, but under the constraint that we cannot realistically expect our maintenance budget to increase substantially. For each airport, the airport master plan process is the ultimate determinant of airport dimensions, not the regional plan. The plan simply tries to use a regional analysis to help us anticipate where and when some of the more critical improvements will be needed *from a system perspective*. Individual airport projects are scored through the Aviation Improvement Program process evaluation criteria, and the priority generally given to greatest need. In the past, evaluations have tended to favor bringing substandard runways to the minimum standard.

It is possible to build longer runways if recommended in the airport master plan, but the issue of affordability comes up. We agree that projects such as that desired by Levelock ought to be considered for their economic development potential, but the question is how to pay for building and maintaining the “extra” runway length? DOT&PF’s current

maintenance funding is such that the added costs of operating an expanded facility can only be accommodated by subtracting operating costs at another facility. This translates into closed facilities or reduced hours of operation. Before we can make that call, we need to analyze what the impacts of such reduced service would be. Without the analysis, the only acceptable choice is to try to maintain all facilities at close to existing levels of service, which is what we are currently doing.

There may be a solution possible if additional sources of capital and operating funds can be identified and brought into the picture through partnership. One concern is that in the past, the State has typically incurred the responsibility for full operation of a facility if the additional funding partner proves unable to meet its obligations. Consequently, as a department we have tended to steer shy of arrangements that put us in the unfavorable position of assuming risk that belongs more appropriately to another organization. I expect this tendency will continue.


•Air transport - We agree that air transport will continue to be the most viable mode of transportation for movement of goods and services in the region for the foreseeable future, and we share your concern for getting the best factual data possible. We attribute many of the concerns we have heard expressed in your letter and others to inadequate data and incorrect data entry in the draft tech memo. We hope that you will find the revised airport improvement analysis, when completed, credible in its data, methodology, and findings. We anticipate completion of the revised report in July.

Should you have additional comments or questions please feel free to contact me via letter, email (eric\_taylor@dot.state.ak.us), toll free phone 1-888-PLANDOT or toll-free fax 1-888-PLANFAX. We have added your letter and this response to our SW Transportation Plan Correspondence Reading Room on the internet at the following URL:

[http://www.dot.state.ak.us/external/state\\_wide/planning/swcorr/swcorr.html](http://www.dot.state.ak.us/external/state_wide/planning/swcorr/swcorr.html)

Thanks again for your interest.

Sincerely,



Eric Taylor  
Area Plans Coordinator